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15 *Counsel for Defendant Meta Platforms, Inc.*

16 UNITED STATES DISTRICT COURT  
17 NORTHERN DISTRICT OF CALIFORNIA  
18 SAN FRANCISCO DIVISION

19 RICHARD KADREY, *et al.*,  
20 Individual and Representative Plaintiffs,  
21 v.  
22 META PLATFORMS, INC., a Delaware  
23 corporation;  
24 Defendant.

Case No. 3:23-cv-03417-VC-TSH

**DECLARATION OF KATHLEEN HARTNETT  
IN SUPPORT OF OPPOSITION TO  
PLAINTIFFS' MOTION TO MODIFY  
STIPULATION AND ORDER RE SCHEDULE**

Discovery Cut-Off: December 13, 2024  
Date Action Filed: July 7, 2023

1 I, Kathleen Hartnett, declare as follows:

2 1. I am a partner at the law firm of Cooley LLP and am counsel to Defendant Meta  
3 Platforms, Inc. ("Meta") in the above-captioned case. I have personal knowledge of the facts  
4 contained in this Declaration and, if called upon as a witness, could competently testify to them  
5 under oath.

6 2. Attached hereto as Exhibit 1 is a true and correct copy of an email exchange between  
7 Maxwell Pritt, counsel for Plaintiffs, and Kathleen Hartnett, counsel for Meta, dated October 29,  
8 2024.

9 3. Attached hereto as Exhibit 2 is a true and correct copy of an email sent by Reed  
10 Forbush, counsel for Plaintiffs, to Ms. Rose Maher, Calendar Clerk and Courtroom Deputy for  
11 Magistrate Judge Hixson, dated October 23, 2024.

12 4. Attached hereto as Exhibit 3 is a true and correct copy of the Discovery Standing  
13 Order for Magistrate Judge Thomas S. Hixson, downloaded from  
14 <https://www.cand.uscourts.gov/wp-content/uploads/2023/03/TSH-Discovery-Standing-Order.pdf>  
15 on November 1, 2024.

16 5. Attached hereto as Exhibit 4 is a true and correct copy of an Order in *Cleveland v.*  
17 *Ludwig Inst. For Cancer Rsch. Ltd.*, Case No. 19-cv-02141-JM-JLB, 2022 WL 959598 (S.D. Cal.  
18 March 30, 2022), with highlighting added to pertinent portions of the Order.

19 6. Attached hereto as Exhibit 5 is a true and correct copy of an email chain between  
20 counsel including an email dated October 29, 2024, from Alexander Sweatman to Judd Lauter.

21 I declare under penalty of perjury that the foregoing is true and correct. Executed on this  
22 1st day of November 2024 at Oakland, California.

23  
24  
25 /s/ Kathleen Hartnett  
Kathleen Hartnett